

EXHIBIT 4



1 Geoffrey M Davis (214692)
2 geoffrey.davis@klgates.com
3 K&L GATES LLP
4 10100 Santa Monica Boulevard Eighth Floor
5 Los Angeles, CA 90067
6 Telephone: +1 310 552 5000
7 Facsimile: +1 310 552 5001

6 | Attorneys for Defendant Crane Co.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MARTIESE HERBAGE, Individually and as Successor-in-Interest to DANIEL HERBAGE, Deceased, MATTHEW HERBAGE and STEPHANIE HERBAGE DESIST,

14 Plaintiffs,

V.

AMCORD, INC., *et al.*,

Defendants.

Case No. 21STCV35410

JCCP No.: 4674

CRANE CO.'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' LAOSD GENERAL ORDER STANDARD INTERROGATORIES TO DEFENDANT CRANE CO.

Complaint Filed: September 27, 2021

PROPOUNDING PARTY: Plaintiffs, MARTIESE HERBAGE, Individually and as Successor-in-Interest to DANIEL HERBAGE, Deceased, MATTHEW HERBAGE and STEPHANIE HERBAGE DESIST

RESPONDING PARTY: Defendant, CRANE CO.

SET NO: ONE

Defendant Crane Co. objects and responds to Plaintiffs' LAOSD General Order Standard Interrogatories Propounded to Defendant Crane Co. as follows:

**CRANE CO.'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' LAOSD GENERAL ORDER STANDARD
INTERROGATORIES TO DEFENDANT CRANE CO.**

1 **INTERROGATORY NO. 27:**

2 Did **YOU** ever warn of any health hazards of **ASBESTOS**? If so, for each such warning, then
3 state:

- 4 A. The content, size, color, and location of the warning (including but not limited to
5 whether the warning appeared on the material and/or on the container, and/or was
6 placed on a tag; whether the warning was included in contracts or whether the
7 warning was included in brochures, catalogs, advertising or other promotional
8 materials);
9 B. Whether **YOU** have any photographs or images thereof;
10 C. The inclusive dates on which each such warning was used; and
11 D. All changes made to each warning and the dates of such changes.

12 **ANSWER:** In addition to the General Objections set forth above, Crane Co. objects to
13 this Interrogatory because it is overly broad and unduly burdensome. Crane Co. further objects
14 to this Interrogatory because it seeks information that is not relevant and it is not reasonably
15 calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this
16 Interrogatory to the extent it implies (i) that Crane Co. manufactured “asbestos products” as it
17 understands that term and as that term is commonly used in asbestos litigation; (ii) that Crane
18 Co. ever manufactured, refined, or processed, “loose asbestos fibers”; or (iii) that Crane Co.
19 manufactured products were harmful when used as intended. Crane Co. was not a
20 manufacturer of “asbestos products.” At all times relevant and as it pertains to this case, Crane
21 Co. is and has been a manufacturer and seller of industrial fluid control products – most notably
22 metal valves. Crane Co. objects to this Interrogatory to the extent it seeks information
23 concerning sales by entities which were not affiliated with Crane Co. at the time of sale, or
24 information concerning products not identified by Plaintiffs, as such information is irrelevant.
25 Finally, Crane Co. objects to this Interrogatory as compound, vague, and ambiguous.

26 Subject to and without waiving the foregoing objections, to the best of
27 Crane Co.’s present knowledge, the only statement associated with any Crane Co. manufactured
28 industrial product regarding asbestos was a notification that first appeared in the mid-1980s